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8 *Attorneys for Debtors,*
9 *Debtors in Possession and Sajid Sohail*

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **OAKLAND DIVISION**

13 **In re:**

14 **JADOOTV, INC.,**

15 **- and -**

16 **CLOUDSTREAM MEDIA, INC.,**

17 **Debtors.**

- 18 ☐ Affects JadooTV, Inc.
19 ☐ Affects CloudStream Media, Inc.
20 ☒ Affects both Debtors

21 ** All papers shall be filed in the Lead Case,*
22 *No. 19-41283 (WJL).*

Bankruptcy Case
No. 19-41283 (WJL)

Chapter 11

(Lead Case)

(Jointly Administered)

**SUPPLEMENTAL MEMORANDUM
REGARDING FIRST INTERIM
APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES
FOR CHAN PUNZALAN LLP FOR THE
PERIOD OF JULY 2, 2019 TO OCTOBER
21, 2019**

Date: November 13, 2019
Time: 10:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 220
1300 Clay Street
Oakland, CA

1 As stated in Chan Punzalan LLP's ("CP") First Interim Fee Application [Docket No. 178]
2 ("Fee Application"), CP seeks compensation and reimbursement pursuant the Court's Order
3 Authorizing Retention of Chan Punzalan LLP as Debtors' Litigation Counsel, *Nunc Pro Tunc* to
4 July 1, 2019 [Docket No. 124] (the "Retention Order"). In particular, CP has performed
5 substantial work to protect the interests of the Debtors and Sajid Sohail related to the pending
6 Copyright and Patent Actions, and its fees and expenses are reasonable. CP provides this response
7 to address several matters: 1) to correct a calculation error in the Fee Application, 2) to amend its
8 Fee Application to exclude fees related to the work performed for Sajid Sohail, and 3) to briefly
9 respond to the United States Trustee ("UST") and Dish's objections to CP's Fee Application.

10 **A. Correction of Error in Fee Application**

11 CP's Fee Application sought an interim allowance of compensation in a total amount of
12 \$53,361.33 for fees. However, upon further review of its Fee Application, the total amount
13 requested should have been stated as \$63,869.00. Pages 12 and 13 of the Fee Application [Docket
14 No. 178] list the categories and fee amounts, which fees total \$63,869.00, not the amount stated in
15 the initial Fee Application. CP apologizes to the Court for this error.

16 **B. Amendment of Fee Request**

17 Additionally, for the reasons explained below, CP amends its request for fees and expenses
18 to exclude fees for work performed for Mr. Sohail, which total \$18,207. On November 7, 2019,
19 the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C. § 1112 to Dismiss Chapter 11 Case*
20 *of CloudStream Media, Inc.* [Docket No. 190], which seeks to dismiss the chapter 11 case of
21 Debtor CloudStream Media, Inc. ("CSM"). Because Mr. Sohail has an indemnification agreement
22 with CSM for payment of his legal fees, Mr. Sohail will seek reimbursement of his defense costs
23 directly from CSM if and when CSM's chapter 11 case is dismissed.

24 The fees pertaining specifically to Mr. Sohail total \$18,207 and are listed on page 13 of the
25 Fee Application [Docket No. 178, Letters I and J]). CP amends its Fee Application to exclude fees
26 for work performed for Mr. Sohail, and CP now only seeks reimbursement for fees performed for
27
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1 the Debtors. CP reserves its right to seek its fees for work performed for Mr. Sohail in the event
2 that the Court does not grant CSM's motion to dismiss its chapter 11 case.

3 CP's fees for services performed for the Debtors are listed on page 12 of the Fee
4 Application [Docket No. 178, Letters A to H], in a total amount of \$45,662.50. The expenses for
5 work performed on behalf of the Debtors total \$711.83.

6 **C. UST and Dish's Objections to Fee Application**

7 The UST and Dish objected to CP's Fee Application. Notably, both the UST and Dish only
8 object to the fees for services CP performed for Sajid Sohail, not for the services performed for the
9 Debtors. As stated above, CP no longer seeks fees for the services performed for Mr. Sohail, and
10 these objections are thus moot. By amending its Fee Application, CP does not waive any
11 arguments to the UST and Dish's objections and reserves its rights to make these arguments in the
12 future.

13 **CONCLUSION**

14 Chan Punzalan respectfully requests an interim allowance to Chan Punzalan for
15 compensation in the amount of \$45,662.50 and reimbursement of actual and necessary expenses in
16 the amount of \$711.83, and an authorization for payment of a total allowance of \$46,374.33; and
17 for such other and further relief as this Court deems proper.

18 Dated: November 11, 2019

CHAN PUNZALAN LLP

19 /s/ Mark Punzalan

20 Mark Punzalan

21 *Attorneys for Debtors, Debtors in Possession,*
22 *and Sajid Sohail*
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